



EPA/REGION IV
ATLANTA, GA.

Site:	Medley
Break:	3.4
Other:	7/30/90

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CDM FEDERAL PROGRAMS CORPORATION

GRANTS/CONTRACTS UNIT

July 30, 1990

Mr. Jon Bornholm
Work Assignment Manager
U.S. Environmental Protection Agency
345 Courtland Street
Atlanta, GA 30365

PROJECT: EPA Contract No.: 68-W9-0004
DOCUMENT NO: TES7-C04033-EP-BVJQ
SUBJECT: Technical Review of Phase II RI/FS Work Plan for WA C04033
Medley Farm Superfund Site
Document No. TES7-C04033-RT-BVJR-2

Dear Mr. Bornholm:

This letter documents the transmittal of the above referenced TES VII document as partial fulfillment of the reporting requirements for Work Assignment C04033.

If you have any comments regarding this document, please contact Tim Eggert or myself at (404) 952-7393.

Sincerely,

CDM Federal Programs Corporation

Abel B. Dunning
TES VII, Atlanta Manager

TE/ABD/ln

cc: Jean Wright, EPA HQ TES VII Zone Project Officer
Ken Meyer, EPA Regional Project Officer, CERCLA Region IV w/enclosure
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Document Control (2)
File TES7/C0433



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Site: Medley
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TECHNICAL REVIEW OF
PHASE II RI/FS
WORK PLAN

MEDLEY FARM SUPERFUND SITE

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, D.C. 20460

Work Assignment No.	: C04033
EPA Region	: IV
Site No.	: 4P73
Contract No.	: 68-W9-0004
CDM Federal Programs Corporation Document No.	: TES7-C04033-RT-BVJR-2
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Date Prepared	: July 30, 1990

1.0 INTRODUCTION

CDM Federal Programs Corporation (FPC) received a work assignment (WA) from the U.S. Environmental Protection Agency (EPA) (EPA Contract No. 68-W9-0004, WA No. C04033) to provide technical oversight of remedial investigation/feasibility study (RI/FS) activities taking place at the Medley Farm site, Gaffney, South Carolina. FPC has subcontracted Versar, Inc. to perform these services. This report presents the results of Versar's technical review of the Phase II RI/FS Work Plan prepared for the site. The RI/FS is being performed by Serrine Environmental Consultants (SEC) on behalf of the potentially responsible parties (PRPs).

The scope and quality of the Phase II RI Work Plan was evaluated with respect to (1) objectives outlined in the Phase I Work Plan and the Phase I RI Report; (2) the PRPs document entitled "Additional Data requirements to Support Preparation of a Baseline Risk Assessment and Feasibility study" was evaluated with respect to Phase I RI Report; (3) objectives for conducting RIs under the National Oil and Hazardous Substance Pollution Contingency Plan (NCP), as implemented under the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) and as amended under the Superfund Amendments and Reauthorization Act of 1986 (SARA) (40 CFR 300 et seq.); (4) concepts and technical standards for conducting RIs as discussed in "Interim Final Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA" (EPA, August 1988); and (5) procedures consistent with standard industry practices common to the technical fields involved and with U.S. EPA guidances and policies.

General comments are addressed in Section 2.0, and specific comments are listed in Section 3.0 by page and location in the text.

2.0 GENERAL COMMENTS

The technical review of the Phase II RI/FS Work Plan for the Medley Farm site presents a reasonable discussion of the activities that are planned to address data gaps that have been identified in the draft Remedial Investigation Report. The additional data to be obtained, as identified in the Phase II RI/FS Work Plan and the PRP's document "Additional Data Requirements to Support Preparation of a Baseline Risk Assessment and Feasibility Study for the Medley Farm Site, Gaffney, South Carolina", dated July 11, 1990, will allow an endangerment assessment for the site to be completed. Although, additional sampling locations are recommended and are discussed in Section 3 of this technical review report.

A major concern with this plan is the use of the hydropunch method for collecting groundwater samples. This plan does not specify an alternative drilling method should the hydropunch method fail to meet the objectives of the Work Plan. A more detailed description of the proposed method of drilling/well installation and groundwater sampling procedures is necessary to accurately evaluate this proposed technique.

3.0 SPECIFIC COMMENTS

This section of the Phase II RI/FS Work Plan for the Medley Farm site lists the specific comments of the reviewer collated to the corresponding Phase II RI/FS Work Plan page and paragraph numbers.

<u>Page</u>	<u>Paragraph</u>	<u>Comment</u>
4	1	Phase IV, for dioxin analyses, should be changed to Phase IB.
10	2.1 Data Quality Objectives	Will field screening techniques be used during the field investigative tasks?
10	Last	It is questionable if the hydropunch will be able to collect groundwater samples from discrete intervals in the fractured bedrock. This sentence needs to be clarified.
11	Table 2.1	First bullet "12 or 15" should be changed to 12 to 15.
12	Table 2.2	If field screening methods are to be used during field activities, these methods should be identified in Table 2.2.
13	Last	"Significant levels of PCBs, pesticides and inorganics" should be identified.
19	I	The Phase II RI/FS Work Plan should state that activities will be in accordance with EPA Region IV Standard Operating Procedures, or approved modifications to these procedures.

23	3	All proposed surface soil sampling locations are at least 100 feet apart. Additional surface soil sampling locations are necessary to adequately characterize the former waste disposal area. Additional surface soil sampling will aid in EA preparation.
23	1	What type drilling methods are proposed for the installation of permanent monitor wells?
24	3	The groundwater sampling procedure is unclear. Why will sampling locations be auger drilled first and then sampled with the hydropunch?
25	4	Geophysical logging should be considered as an additional tool for identifying discrete fracture zones. Geophysical logging would be especially helpful if core recovery is poor.
27	1	" . . shipped to the CLP laboratory and held for potential CLP analyses." Sample holding times must be considered.
27	1	What is a significant decrease in residual chemical concentrations?
27	3	Will field parameters such as pH and temperature be measured?
30	1	If possible, the sprouse well should be sampled for site specific contaminants.